

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

MOREHOUSE ENTERPRISES, LLC )  
d/b/a BRIDGE CITY ORDNANCE, GUN )  
OWNERS OF AMERICA, INC., )  
and GUN OWNERS FOUNDATION, )

Plaintiffs, )

v. )

BUREAU OF ALCOHOL, TOBACCO, )  
FIREARMS AND EXPLOSIVES; UNITED )  
STATES DEPARTMENT OF JUSTICE; )  
STEVEN M. DETTELBAACH in his official )  
capacity as THE DIRECTOR OF ATF, and HANS )  
HUMMEL, in his official capacity as )  
THE DIRECTOR OF INDUSTRY OPERATIONS )  
FOR THE SAINT PAUL FIELD DIVISION OF )  
THE ATF, )

Defendants. )  
\_\_\_\_\_ )

Case No. 3:23-cv-00129-PDW-ARS

---

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMITATIONS**

---

Come now, Plaintiffs, by and through counsel, pursuant to Civil Rule 7.1(C), and for good cause, file this Motion to Exceed Page Limitations, and in support state as follows:

1. Plaintiffs filed their Complaint for Declaratory and Injunctive Relief on July 11, 2023. Due to the necessity of outlining the various Administrative Action Policy changes and explaining the background in this case, including the legislative history of the underlying statutes, Plaintiffs' Complaint was 66 pages and included 14 exhibits.

2. Due to the complexity of the allegations contained in Plaintiffs' Complaint, the complex issues of federal law involved, and the necessity to provide the Court with the briefing required to address Plaintiffs' Motion, it is necessary to exceed the page limitations set by Civil Rule 7.1(B).

3. Plaintiffs' Memorandum in Support for Preliminary and/or Permanent Injunction is 25 pages in length, 5 pages over the limit established by Civil Rule 7.1(B).

4. As such, Plaintiffs respectfully submit they have established good cause, and request the Court allow the Memorandum in Support of their Motion to exceed the page limitations set by Local Rule by 5 pages.

5. Plaintiffs' counsel conferred with counsel for Defendants who stated that they would not oppose this request if Plaintiffs would not oppose a similar request by Defendants. Plaintiffs will not oppose such a request for the same number of pages.

Respectfully submitted, this the 4th of August, 2023.

/s/ Stephen D. Stamboulieh

Stephen D. Stamboulieh (MS # 102784)

Stamboulieh Law, PLLC

P.O. Box 428

Olive Branch, MS 38654

(601) 852-3440

[stephen@sdslaw.us](mailto:stephen@sdslaw.us)

Robert J. Olson (VA # 82488)

William J. Olson, PC

370 Maple Ave. West, Suite 4

Vienna, VA 22180-5615

703-356-5070 (T)

703-356-5085 (F)

[wjo@mindspring.com](mailto:wjo@mindspring.com)

John I. Harris III (TN # 12099)

Schulman, LeRoy & Bennett PC

3310 West End Avenue, Suite 460

Nashville, Tennessee 37203

(615) 244 6670 Ext. 111

Fax (615) 254-5407

[jharris@slblawfirm.com](mailto:jharris@slblawfirm.com)

**CERTIFICATE OF SERVICE**

I Stephen D. Stamboulieh, hereby certify that I have on this day, caused the foregoing document or pleading to be mailed by United States Postal Service first-class mail, postage pre-paid, and by electronic mail, to the following non-ECF participants who has confirmed that they represent the above-named defendants in this action:

Michael Drezner  
Taylor Pitz  
Federal Programs Branch, Civil Division  
U.S. Department of Justice  
1100 L Street NW  
Washington, DC 20005  
Work: 202.514.4505  
[Michael.L.Drezner@usdoj.gov](mailto:Michael.L.Drezner@usdoj.gov)  
[Taylor.n.pitz@usdoj.gov](mailto:Taylor.n.pitz@usdoj.gov)

Dated: August 4, 2023.

/s/ Stephen D. Stamboulieh  
Stephen D. Stamboulieh